

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹)	Case No. 25-10068 (CTG)
)	
Debtors.)	(Jointly Administered)
)	
)	Re: Docket No. 396

**NOTICE OF SECOND AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON FEBRUARY 14, 2025 AT 9:30 A.M. (EASTERN TIME)
BEFORE THE HONORABLE CRAIG T. GOLDBLATT**

This proceeding will be conducted in-person. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom. Please refer to Judge Goldblatt's Chambers Procedures (<https://www.deb.uscourts.gov/content/judge-craig-t-goldblatt>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Goldblatt's expectations of remote participants, and the advance registration requirements. Registration is required by 4:00 p.m. (Eastern time) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

ADJOURNED MATTERS

1. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed January 15, 2025) [Docket No. 6]

Related Documents:

- (a) Notice of Filing Revised Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed January 16, 2025) [Docket No. 88]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

² **Amendments appear in bold print.**

- (b) Interim Order (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Entered January 16, 2025) [Docket No. 106]
- (c) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed January 17, 2025) [Docket No. 129]

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended to February 5, 2025 for the *ad valorem* taxing authorities in Texas, and until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors and for Witte Plaza, Ltd.

Responses Received: Informal comment by Witte Plaza, Ltd.

- (a) United States Trustee's Omnibus Objection to: (1) Motion of Debtors for Entry of an Order, Inter Alia, Approving Bidding Procedures and Scheduling Certain Dates and Deadlines With Respect Thereto; (2) Motion of Debtors for Entry of Interim and Final Orders, Inter Alia, Authorizing the Debtors to Use Cash Collateral; and (3) Motion of Debtors for Entry of an Order, Inter Alia, Extending Time to File Certain Bankruptcy Schedules and Statements (Filed February 5, 2025) [Docket No. 285]
- (b) [SEALED] Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 6, 2025) [Docket No. 299]
- (c) [SEALED] Declaration of Andrew K. Glenn in Support of the Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 6, 2025) [Docket No. 300]
- (d) [SEALED] Omnibus Objection of the Official Committee of Unsecured Creditors to Debtors Motions (I) for Entry of an Order Approving Bidding Procedures and Stalking Horse Agreement; and (II) for Entry of a Final Order Authorizing the Use of Cash Collateral (Filed February 6, 2025) [Docket No. 303]
- (e) Wilmington Savings Fund Society, FSB's Joinder to Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to The Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 305]

- (f) Limited Objection of ARC CLORLFL001, LLC; ARC NLLKLFL001, LLC; ARC SMWMBFL001, LLC; ARG JAFPTIL001, LLC; ARG MHMORNC001, LLC; ARG OTOWEKEY001, LLC; Acadia Realty Limited Partnership; American Fork SC, LLC; BMA JC LLC; Brixmor Operating Partnership LP; CCA-RSSC LLC; EDENS; Federal Realty OP LP; Gallatin Mall Group, L.L.C.; Hutensky Capital Partners, LLC; LA Costa Capital Partners; Lancaster Development Company LLC; Marketplace West Partners, LLC; Orem Family Center, LLC; PBA II, LLC; Pride Center Co., LLC; RD Management, LLC; Renaissance Partners I, LLC; Santa Susana GRF2, LLC; Sherman Commons, L.P., Shopping Center Associates, LP; TPP 217 Taylorsville, LLC; The Sterling Organization; UFPTFC, LLC & BBTFCLLC; and, Westford Valley Marketplace, Inc. to Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed February 7, 2025) [Docket No. 308]
- (g) Objection to Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, Etc. (Filed February 7, 2025) [Docket No. 309]
- (h) The Official Committee of Unsecured Creditors' Witness and Exhibit List (Filed February 7, 2025) [Docket No. 312]
- (i) [Lion Brand] Joinder to Preliminary Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 323]
- (j) Limited Objection and Joinder of Arbor Square II, LLC, CRI Easton Square LLC, DLC Management Corporation, First National Realty Partners, Gibraltar Management Co., Inc., Inland Commercial Real Estate Services LLC, National Realty & Development Corp., PTC TX Holdings, LLC, Rivercrest Realty Associates, LLC, Westfield, LLC, and Wheeler Real Estate Investment Trust Inc. to Motion of Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed February 7, 2025) [Docket No. 329]
- (k) Joinder of Granite Village West, L.P. and Lynnwood Tower, LLC, in Limited Objection of Multiple Landlords to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Creditors, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief (Filed February 7, 2025) [Docket No. 330]

- (l) Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 335]
- (m) Declaration of Andrew K. Glenn in Support of the Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 336]
- (n) Notice of Filing of Unredacted (A) Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion and (B) Declaration of Andrew K. Glenn in Support of the Preliminary Omnibus Objection (Filed February 7, 2025) [Docket No. 337]
- (o) [Unredacted] Omnibus Objection of the Official Committee of Unsecured Creditors to Debtors Motions (I) for Entry of an Order Approving Bidding Procedures and Stalking Horse Agreement; and (II) for Entry of a Final Order Authorizing the Use of Cash Collateral (Filed February 8, 2025) [Docket No. 338]
- (p) **Omnibus Response of Bank of America, N.A., as Prepetition ABL Agent, to Objections to the Cash Collateral Motion and the Bidding Procedures Motion (Filed February 13, 2025) [Docket No. 413]**
- (q) **[SEALED] Omnibus Reply of 1903P Loan Agent, LLC as FILO Agent, to Objections to the Cash Collateral Motion and the Bidding Procedures Motion (Filed February 13, 2025) [Docket No. 414]**
- (r) **[Redacted] Omnibus Reply of 1903P Loan Agent, LLC as FILO Agent, to Objections to the Cash Collateral Motion and the Bidding Procedures Motion (Filed February 13, 2025) [Docket No. 416]**
- (s) **Motion of 1903P Loan Agent, LLC to (I) Redact the Omnibus Reply of 1903P Loan Agent, LLC, AS FILO Agent, to Objections to the Cash Collateral Motion and the Bidding Procedures Motion and (II) Seal Certain Exhibits Thereto (Filed February 13, 2025) [Docket No. 417]**

Status: This matter is adjourned to a date to be determined. A notice will be filed setting the date for this matter to be heard. This matter will not be going forward.

2. Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed January 15, 2025) [Docket No. 14]

Related Documents:

- (a) Interim Order (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Entered January 17, 2025) [Docket No. 113]
- (b) Notice of Entry of Interim Order and Final Hearing With Respect to Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed January 17, 2025) [Docket No. 137]
- (c) Notice of Rescheduled Hearing (Filed February 10, 2025) [Docket No. 354]
- (d) **Certification of Counsel Regarding Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed February 13, 2025) [Docket No. 406]**

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received: Informal comment by (i) Waste Management and various affiliates and/or subsidiaries, (ii) Granite Telecommunications, LLC, and (iii) the Office of the U.S. Trustee.

- (a) Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance

Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed January 31, 2025) [Docket No. 225]

- (b) Joinder of Certain Utility Companies to the Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed January 31, 2025) [Docket No. 226]
- (c) Joinder of Certain FirstEnergy Operating Companies to the Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed January 31, 2025) [Docket No. 227]
- (d) **Notice of Withdrawal of Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed February 13, 2025) [Docket No. 402]**
- (e) **Notice of Withdrawal of Joinder of Certain Utility Companies to the Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed February 13, 2025) [Docket No. 403]**
- (f) **Notice of Withdrawal of Joinder of Certain FirstEnergy Operating Companies to the Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Adequate Assurance of Payment for Future Utility Services, (II) Approving the Debtors' Proposed Procedures for**

Resolving Adequate Assurance Requests, (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (IV) Authorizing Certain Fee Payments for Prepetition Services Performed, and (V) Granting Related Relief (Filed February 13, 2025) [Docket No. 404]

Status: **A Certification of Counsel, together with a revised proposed Order, was filed with the Court. This matter will not be going forward unless otherwise directed by the Court.**

MATTERS GOING FORWARD

3. Motion of Debtors for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (II) Granting Related Relief (Filed January 15, 2025) [Docket No. 16]

Related Documents:

- (a) Notice of Motion of Debtors for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (II) Granting Related Relief (Filed January 17, 2025) [Docket No. 139]
- (b) Notice of Rescheduled Hearing (Filed February 10, 2025) [Docket No. 354]
- (c) **Certification of Counsel Regarding Motion of Debtors for Entry of an Order (I) Authorizing and Approving Procedures to Reject or Assume Executory Contracts and Unexpired Leases, and (II) Granting Related Relief (Filed February 13, 2025) [Docket No. 401]**

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received: Informal comments from (i) the Official Committee of Unsecured Creditors, (ii) the Office of the U.S. Trustee, (iii) Edison & Company, (iv) WPH Legacy, LLC, (v) Clark Hill, (vi) Village West and Lynwood Center, (vii) landlords represented by Barclay Damon LLP, (viii) landlords represented by Ballard Spahr LLP, and (ix) landlords represented by Allen Matkins Leck Gamble Mallory & Natsis LLP.

- (a) Limited Omnibus Objection of IG Design Group Americas, Inc. to Sale Procedures Motion and Contract Procedures Motion (Filed February 4, 2025) [Docket No. 258]

Status: **A Certification of Counsel, together with a revised proposed order, was filed with the Court. This matter will not be going forward unless otherwise directed by the Court.**

4. Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief (Filed January 15, 2025) [Docket No. 17]

Related Documents:

- (a) Notice of Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief (Filed January 17, 2025) [Docket No. 140]
- (b) Notice of Potential Sale Hearing (Filed January 24, 2025) [Docket No. 182]
- (c) Notice of Rescheduled Hearing (Filed February 10, 2025) [Docket No. 354]
- (d) Declaration of Elise S. Frejka, CIPP/US, in Support of the Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief (Filed February 12, 2025) [Docket No. 388]
- (e) Debtors' Witness and Exhibit List for Hearing Scheduled for February 14, 2025 at 9:30 a.m. (Prevailing Eastern Time) (Filed February 12, 2025) [Docket No. 389]
- (f) **Notice of Filing Revised Proposed Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief (Filed February 13, 2025) [Docket No. 409]**

(g) **Motion of Debtors for Leave to File Late Reply in Support of Debtors' Bidding Procedures Motion (Filed February 13, 2025) [Docket No. 410]**

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received: Informal comments by (i) landlords of Village West and Lynnwood Center and (ii) Witte Plaza, Ltd.

- (a) Crafty (AL) LLC's Limited Objections to Debtors' Motion for Entry of an Order, Inter Alia: (I) Approving Stalking Horse Agreement; (II) Authorizing Assumption and Assignment of Assumed Contracts and Leases; and (III) Approving Sale of Assets (Filed February 4, 2025) [Docket No. 257]
- (b) Limited Omnibus Objection of IG Design Group Americas, Inc. to Sale Procedures Motion and Contract Procedures Motion (Filed February 4, 2025) [Docket No. 258]
- (c) [SEALED] Exhibit A to (I) Limited Omnibus Objection to Sale Procedures Motion and Contract Procedures Motion and (II) Motion (A) to Compel the Debtors to Assume or Reject Executory Contract, and (B) to Modify the Automatic Stay (Filed February 4, 2025) [Docket No. 261]
- (d) United States Trustee's Omnibus Objection to: (1) Motion of Debtors for Entry of an Order, Inter Alia, Approving Bidding Procedures and Scheduling Certain Dates and Deadlines With Respect Thereto; (2) Motion of Debtors for Entry of Interim and Final Orders, Inter Alia, Authorizing the Debtors to Use Cash Collateral; and (3) Motion of Debtors for Entry of an Order, Inter Alia, Extending Time to File Certain Bankruptcy Schedules and Statements (Filed February 5, 2025) [Docket No. 285]
- (e) [SEALED] Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 6, 2025) [Docket No. 299]
- (f) [SEALED] Declaration of Andrew K. Glenn in Support of the Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 6, 2025) [Docket No. 300]
- (g) [SEALED] Omnibus Objection of the Official Committee of Unsecured Creditors to Debtors Motions (I) for Entry of an Order Approving Bidding Procedures and Stalking Horse Agreement; and (II) for Entry of a Final Order Authorizing the Use of Cash Collateral (Filed February 6, 2025) [Docket No. 303]

- (h) Wilmington Savings Fund Society, FSB's Joinder to Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 305]
- (i) The Official Committee of Unsecured Creditors' Witness and Exhibit List (Filed February 7, 2025) [Docket No. 312]
- (j) Objection of ARC CLORLFL001, LLC; ARC NLLKLFL001, LLC; ARC SMWMBFL001, LLC; ARG JAFPTIL001, LLC; ARG MHMORNC001, LLC; ARG OTOWEKY001, LLC; Acadia Realty Limited Partnership; American Fork SC, LLC; BMA JC LLC; Brixmor Operating Partnership LP; CCA-RSSC LLC; EDENS; Federal Realty OP LP; Gallatin Mall Group, L.L.C.; Hutensky Capital Partners, LLC; La Costa Capital Partners; Lancaster Development Company LLC; Marketplace West Partners, LLC; Orem Family Center, LLC; PBA II, LLC; Pride Center Co., LLC; RD Management, LLC; Renaissance Partners I, LLC; Santa Susana GRF2, LLC; Sherman Commons, L.P., Shopping Center Associates, LP; TPP 217 Taylorsville, LLC; The Sterling Organization; UFPTFC, LLC & BBTFC LLC; and, Westford Valley Marketplace, Inc. to Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief (Filed February 7, 2025) [Docket No. 317]
- (k) Limited Objection of GC Ambassador Courtyard LLC, MP Elko, LLC, and MGP XII Sunrise Village, LLC to Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief (Filed February 7, 2025) [Docket No. 319]
- (l) [Lion Brand] Joinder to Preliminary Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 323]
- (m) Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 335]

- (n) Declaration of Andrew K. Glenn in Support of the Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion (Filed February 7, 2025) [Docket No. 336]
- (o) Notice of Filing of Unredacted (A) Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion and (B) Declaration of Andrew K. Glenn in Support of the Preliminary Omnibus Objection (Filed February 7, 2025) [Docket No. 337]
- (p) [Unredacted] Omnibus Objection of the Official Committee of Unsecured Creditors to Debtors Motions (I) for Entry of an Order Approving Bidding Procedures and Stalking Horse Agreement; and (II) for Entry of a Final Order Authorizing the Use of Cash Collateral (Filed February 8, 2025) [Docket No. 338]
- (q) **The Official Committee of Unsecured Creditors Witness and Exhibit List for Hearing Scheduled February 14 at 9:30 a.m. (ET) (Filed February 12, 2025) [Docket No. 399]**
- (r) **Omnibus Response of Bank of America, N.A., as Prepetition ABL Agent, to Objections to the Cash Collateral Motion and the Bidding Procedures Motion (Filed February 13, 2025) [Docket No. 413]**
- (s) **[SEALED] Omnibus Reply of 1903P Loan Agent, LLC as FILO Agent, to Objections to the Cash Collateral Motion and the Bidding Procedures Motion (Filed February 13, 2025) [Docket No. 414]**
- (t) **[Redacted] Omnibus Reply of 1903P Loan Agent, LLC as FILO Agent, to Objections to the Cash Collateral Motion and the Bidding Procedures Motion (Filed February 13, 2025) [Docket No. 416]**
- (u) **Motion of 1903P Loan Agent, LLC to (I) Redact the Omnibus Reply of 1903P Loan Agent, LLC, AS FILO Agent, to Objections to the Cash Collateral Motion and the Bidding Procedures Motion and (II) Seal Certain Exhibits Thereto (Filed February 13, 2025) [Docket No. 417]**

Status: This matter will be going forward.

5. Motion of Debtors for Entry of an Order (I) Extending the Deadline for the Debtors to Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief (Filed January 21, 2025) [Docket No. 157]

Related Documents:

- (a) Notice of Rescheduled Hearing (Filed February 10, 2025) [Docket No. 354]

- (b) **Certification of Counsel Regarding Motion of Debtors for Entry of an Order (I) Extending the Deadline for the Debtors to Assume or Reject Unexpired Leases of Nonresidential Real Property and (II) Granting Related Relief (Filed February 13, 2025) [Docket No. 407]**

Objection Deadline: February 4, 2025 at 4:00 p.m. (ET). On consent of the parties, the Objection Deadline was extended until 5:00 p.m. on February 6, 2025 for the Official Committee of Unsecured Creditors.

Responses Received:

- (a) The South Plaza Landlord's Objection to the Debtors' 365(d)(4) Motion (Filed February 4, 2025) [Docket No. 260]

Status: **A Certification of Counsel, together with a revised proposed Order, was filed with the Court. This matter will not be going forward unless otherwise directed by the Court.**

6. Motion of IG Design Group Americas, Inc. to File "Exhibit A" to Limited Objection Under Seal (Filed February 4, 2025) [Docket No. 264]

Related Documents:

- (a) [SEALED] Exhibit A to (I) Limited Omnibus Objection to Sale Procedures Motion and Contract Procedures Motion and (II) Motion (A) to Compel the Debtors to Assume or Reject Executory Contract, and (B) to Modify the Automatic Stay (Filed February 4, 2025) [Docket No. 261]
- (b) IG Design Group Americas, Inc.'s Witness and Exhibit List for Hearing Scheduled for February 11, 2025, at 2:00 p.m. (Eastern Time) (Filed February 7, 2025) [Docket No. 304]
- (c) Notice of Rescheduled Hearing (Filed February 10, 2025) [Docket No. 354]

Objection Deadline: February 11, 2025 at 2:00 p.m. (ET).

Responses Received: None at this time.

Status: This matter will be going forward.

MATTERS REQUESTED TO GO FORWARD

7. Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances and (II) Granting Related Relief (Filed February 12, 2025) [Docket No. 385]

Related Documents:

- (a) Motion of Debtors for Entry of an Order (I) Shortening the Notice and Objection Periods for the Store Closing Motion, and (II) Granting Related Relief (Filed February 12, 2025) [Docket No. 387]
- (b) Debtors' Witness and Exhibit List for Hearing Scheduled for February 14, 2025 at 9:30 a.m. (Prevailing Eastern Time) (Filed February 12, 2025) [Docket No. 389]
- (c) Declaration of Nicholas Haughey in Support of Debtors' Motion for Entry of an Order (I) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to be Free and Clear of All Liens, Claims, and Encumbrances and (II) Granting Related Relief (Filed February 12, 2025) [Docket No. 391]
- (d) **Notice of Filing Revised Proposed Order (I) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances and (II) Granting Related Relief (Filed February 13, 2025) [Docket No. 415]**

Responses Received: Informal comments to Store Closing Motion from (i) the Office of the U.S. Trustee, (ii) IG Design Americas, Inc., and (iii) counsel to certain landlords.

Status: The Motion to Shorten will be heard at the hearing.

ADDITIONAL MATTER TO GO FORWARD

8. **Motion for an Order Authorizing the Official Committee of Unsecured Creditors to File Under Seal Exhibit D of its Omnibus Objection to Debtors' Motions (I) for Entry of an Order Approving Bidding Procedures and Stalking Horse Agreement; and (II) for Entry of a Final Order Authorizing the Use of Cash Collateral (Filed February 12, 2025) [Docket No. 398]**

Related Documents:

- (a) **[SEALED] Omnibus Objection of the Official Committee of Unsecured Creditors to Debtors Motions (I) for Entry of an Order Approving Bidding Procedures and Stalking Horse Agreement; and (II) for Entry**

of a Final Order Authorizing the Use of Cash Collateral (Filed February 6, 2025) [Docket No. 303]

- (b) **[Unredacted] Omnibus Objection of the Official Committee of Unsecured Creditors to Debtors Motions (I) for Entry of an Order Approving Bidding Procedures and Stalking Horse Agreement; and (II) for Entry of a Final Order Authorizing the Use of Cash Collateral (Filed February 8, 2025) [Docket No. 338]**

Objection Deadline: At the hearing.

Responses Received: None at this time.

Status: This matter will be going forward.

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Dated: February 13, 2025
Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451)
Stacy L. Newman (No. 5044)
Michael E. Fitzpatrick (No. 6797)
Jack M. Dougherty (No. 6784)
500 Delaware Avenue, Suite 1410
Wilmington, Delaware 19801
Telephone: (302) 652-3131
Facsimile: (302) 652-3117
Email: preilley@coleschotz.com
snewman@coleschotz.com
mfitzpatrick@coleschotz.com
jdougherty@coleschotz.com

*Proposed Co-Counsel to the Debtors
and Debtors in Possession*

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (admitted *pro hac vice*)
Aparna Yenamandra, P.C. (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: joshua.sussberg@kirkland.com
aparna.yenamandra@kirkland.com

- and -

Anup Sathy, P.C. (admitted *pro hac vice*)
Jeffrey Michalik (admitted *pro hac vice*)
Lindsey Blumenthal (admitted *pro hac vice*)
333 West Wolf Point Plaza
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: anup.sathy@kirkland.com
jeff.michalik@kirkland.com
lindsey.blumenthal@kirkland.com

*Proposed Co-Counsel to the Debtors
and Debtors in Possession*